



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 18 2014

REPLY TO THE ATTENTION OF:
LR-8J

CERTIFIED MAIL 70091680000076778237
RETURN RECEIPT REQUESTED

Mr. Robert Portelli, Owner
Electronic Plating Company
P.O. Box 50469
1821 South 54th Avenue
Cicero, Illinois 60804

Re: Request for Information
EPA ID No.: ILD005166145

Dear Mr. Portelli:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires Electronic Plating Company (the facility or you) to submit certain information relating to the operations at your facility located at 1821 South 54th Avenue in Cicero, Illinois. We are requiring this information to determine the facility's compliance status with Section 3002 of RCRA and its implementing regulations. The enclosure specifies the information you must submit. You must submit this information within 30 calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Spiros Bourgikos, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 CFR Part 2, B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

Electronic Plating Company must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should

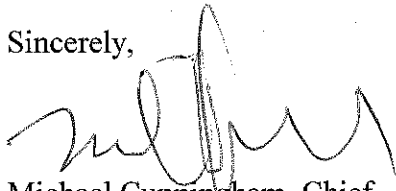
notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject Electronic Plating Company to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Spiros Bourgikos, at (312) 886-6862.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Michael Cunningham', is written over the word 'Sincerely,'.

Michael Cunningham, Chief
Compliance Section 1
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA (w/enclosure)

REQUEST FOR INFORMATION

Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

Requests

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified.
2. Provide a copy of the facility floor plan.
3. Describe each plating line and specify each particular material or ingredient used in each of the plating lines.
4. Specify the date when each plating line was installed.
5. Identify all waste materials generated by the facility's manufacturing, production, and/or service processes.
6. Describe how each waste generated at the facility is managed.
7. Provide any and all waste determinations conducted on the wastes generated by the facility.
8. At the time of the February 10, 2014 inspection, Mr. Valdez could not identify the liquid contents of several open drums present at the facility. These drums are shown in Attachment 1, Photograph Nos. 1 through 4). For each of these drums please specify:
 - a. Has the facility made any determination whether the contents of each of these drums is hazardous waste? If it has made such determination, what was the result of the determination?
 - b. Specify the way each of the wastes have been managed.
9. At the time of the February 10, 2014 inspection, Mr. Heriberto Valdez stated that the Phosphate Zink plating line had not been used since approximately last April (April 2013). For the Phosphate plating line, please specify the last date when the line was in operation.
10. Does the facility have any plans to bring the phosphate plate line back in operation?

11. At the time of the February 10, 2014 inspection, US EPA inspectors observed an open tank holding what Mr. Valdez stated is oil (See Attachment 1 Photograph No. 5). For this tank specify the following:
 - a. The amount of oil stored.
 - b. How long the oil has been stored in the tank?
 - c. Has the facility performed a waste determination on the oil?
 - d. Provide a copy of the material safety data sheet for the oil.
12. At the time of the February 10, 2014 inspection, US EPA inspectors observed a tank (see Attachment 1 Photograph No. 6) located near the phosphate plating line that contained some type of liquid. At the time of the inspection, Mr. Valdez could not identify the contents of this tank. For the tank referenced in this paragraph, specify the amount and type of liquid stored.
13. At the time of the February 10, 2014 inspection, US EPA inspectors observed that several tanks of the phosphate plating line contained free liquids (see Attachment 1 Photograph Nos. 7, 8 and 9). For each tank shown in these photographs, specify the following:
 - a. Size of tank in gallons.
 - b. Amount and type of liquid present in each tank.
 - c. Any waste determinations performed on the contents of each tank.
14. Provide a process flow diagram of the facility's waste water treatment plan. Using the process flow diagram please show how the waste water from the zinc plating lines is segregated from the waste waters generated elsewhere.
15. Provide a copy of any and all permits issued by the Metropolitan Water Reclamation District of Greater Chicago (MWRD) regulating the discharge of waste water from the facility to MWRD's Publicly Owned Treatment Works (POTW).
16. If MWRD permits require the facility to monitor its waste water discharged to the POTW, provide any and all waste water monitoring results for the last 12 months.
17. Provide copies of the waste manifests used for the shipment of F006 waste for the time period of 2/15/2011 to 2/15/2014.
18. Provide a copy of the land disposal restriction form associated with each manifest.
19. Provide a copy of the bill associated with each hazardous waste manifest that was generated by the TSD receiving the waste for the time period of 2/15/2011 to 2/15/2014.
20. Provide a copy of the contingency plan in place designed to address remedial action the facility's officers or employees are to take, in the event of a spill or release.

21. For the time period of January 1, 2010 to the time of receipt of this request provide, the name of each employee filling the jobs referenced in paragraph 20. Specify whether each employee listed is still employed at the facility or not.
22. For each employee (whether or not currently employed) listed in Paragraph 21, provide documentation that each employee managing hazardous waste has received the initial and annual review of the initial hazardous waste training.
23. Provide documentation that the contingency plan has been submitted to all the local police department and fire department, hospitals and State and local emergency response teams.
24. Has the facility ever attempted to make arrangements to familiarize the fire department, police department and emergency response teams, with the layout of the facility and the hazardous waste stored at the facility? If yes, provide documentation of any such arrangements.
25. Provide the name and qualifications of the person giving such training.
26. Provide the job title and job description of each position at the facility related to hazardous waste management and the name of the employee filling each job.
27. Provide the written description of the type and amount of both introductory and continuing training that is given for each job position.
28. Provide copies of the 2008, 2009, 2010, 2011, 2012 and 2013 annual hazardous waste reports required by 35 IAC Section 722.141.
29. Provide a copy of the November 7, 2013 Metropolitan Water Reclamation District of Greater Chicago (District) Cease and Desist Order (C&D) No. 90483 to your company for discharging an effluent with excessive concentrations of cadmium and zinc into the District's sanitary sewage system.
30. Provide a copy of the final compliance report (RD-114) that was due to the District by February 18, 2014.
31. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and

complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Attachment 1

Electronic Plating Photos



Photograph No. 1

Location: Electronic Plating Company – 1821 South 54th Avenue, Cicero, Illinois

Date Photograph Taken: February 10, 2014

Photograph Taken By: Spiros Bourgikos

Description : Two drums of unknown waste located at the east side of the building near the hydrochloric acid storage tank



Photograph No. 2

Location: Electronic Plating Company – 1821 South 54th Avenue, Cicero, Illinois

Date Photograph Taken: February 10, 2014

Photograph Taken By: Spiros Bourgikos

Description : Close up of drum shown in Photograph No. 1



Photograph No. 3

Location: Electronic Plating Company – 1821 South 54th Avenue, Cicero, Illinois

Date Photograph Taken: February 10, 2014

Photograph Taken By: Spiros Bourgikos

Description : Three drums of unknown waste located at the east side of the building near the hydrochloric acid storage tank



Photograph No. 4

Location: Electronic Plating Company – 1821 South 54th Avenue, Cicero, Illinois

Date Photograph Taken: February 10, 2014

Photograph Taken By: Spiros Bourgikos

Description : One drum of unknown waste located at the east side of the building near the hydrochloric acid storage tank



Photograph No. 5

Location: Electronic Plating Company – 1821 South 54th Avenue, Cicero, Illinois

Date Photograph Taken: February 10, 2014

Photograph Taken By: Spiros Bourgikos

Description : Open tank holding what Mr. Valdez described as oil used as a rust inhibitor sprayed on plated parts of the phosphate plating line.



Photograph No. 6

Location: Electronic Plating Company – 1821 South 54th Avenue, Cicero, Illinois

Date Photograph Taken: February 10, 2014

Photograph Taken By: Spiros Bourgikos

Description : Tank containing some type of liquid and covered with cardboard boxes. The Tank in the photograph is indicated by the arrow. The boxes were saturated with water and were and attached frozen to the top of the tank.



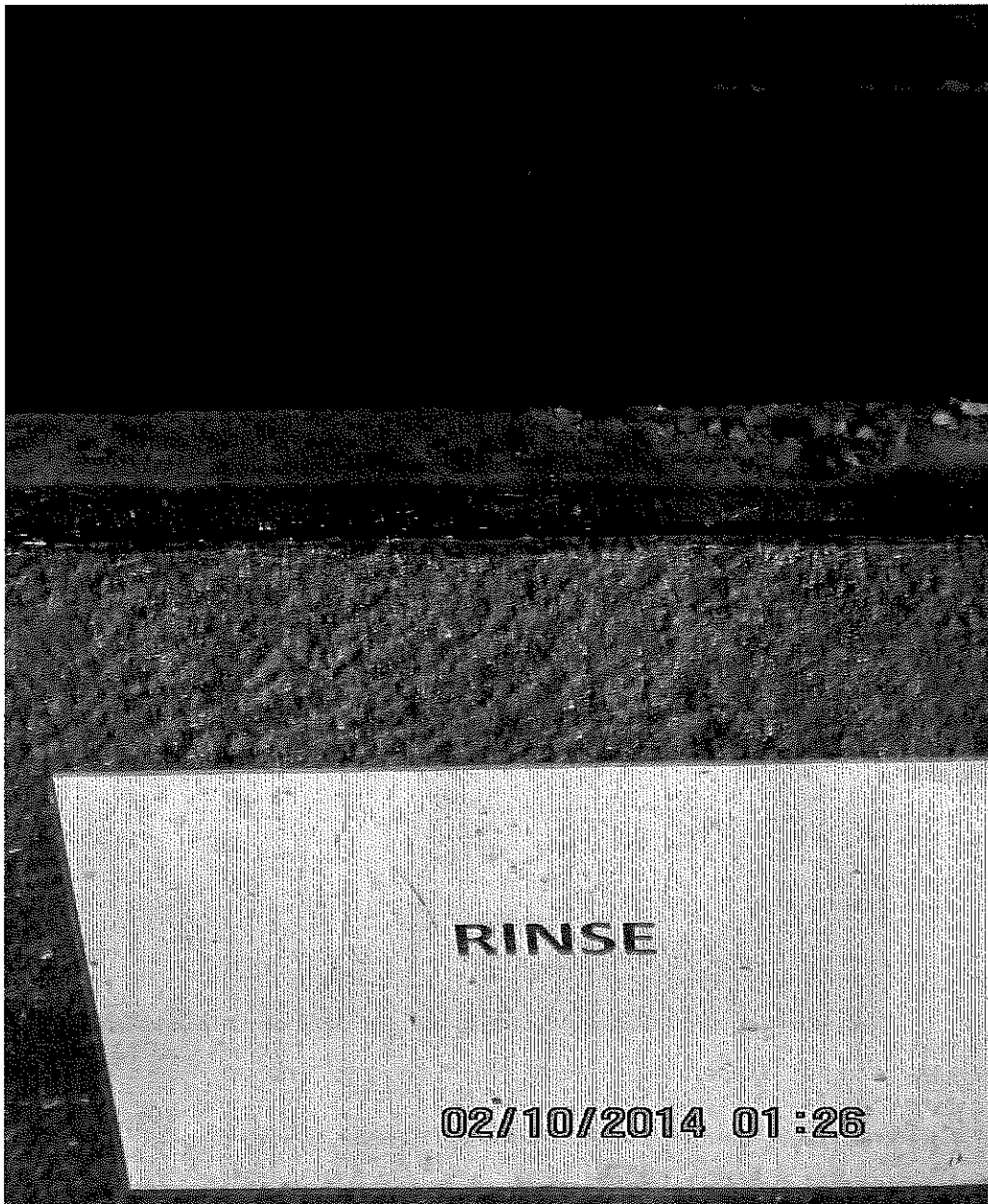
Photograph No. 7

Location: Electronic Plating Company – 1821 South 54th Avenue, Cicero, Illinois

Date Photograph Taken: February 10, 2014

Photograph Taken By: Steve Faryan

Description : The acid tank of the phosphate plating line. This tank contained free liquid.



Photograph No. 8

Location: Electronic Plating Company – 1821 South 54th Avenue, Cicero, Illinois

Date Photograph Taken: February 10, 2014

Photograph Taken By: Spiros Bourgikos

Description : The rinse tanks of the phosphate plating line containing free liquid.



Photograph No. 9

Location: Electronic Plating Company – 1821 South 54th Avenue, Cicero, Illinois

Date Photograph Taken: February 10, 2014

Photograph Taken By: Spiros Bourgikos

Description : Tank part of the phosphate plating line.

